

INSPECTION REPORT

ROLLINS OIL PROCESS COMPANY (OPC)

**5756 Alba Street
Los Angeles, CA 90058
(213) 585-5063**

EPA ID # CAD050806850

**Inspected by: Guillermo Hernandez
Hazardous Materials Specialist**

Date of Inspection: December 2, 1992

Date of Report: March 17, 1993

I. PURPOSE:

To conduct a Compliance Evaluation Inspection (CEI) of a RCRA. treatment, storage and transfer hazardous waste facility.

II. REPRESENTATIVES PRESENT:

Oil Process Company:

William Mitzel, President
Chris Lilley, Drum Process Manager/Chemical Engineer
Willie Ndubuizu, Environmental Affairs Manager

Department of Toxic Substances Control (DTSC):

Guillermo "Memo" Hernandez, Hazardous Materials
Specialist (HMS)
Roberto Kou, Associate HMS
Shereef Aref, HMS

III. OWNER/OPERATOR:

See July 28, 1992, Inspection Report (Attachment A, Page 2).

IV. BACKGROUND:

January 29, 1979 See July 28, 1992, Inspection Report
to (Attachment A, Pages 2 to 5).
May 20, 1992

June 18, 1992 DTSC conducted a CEI at OPC.
and
July 24, 1992

August 4, 1992 DTSC issued a Report of Violations,
resulting from the June 18, and July 1992,
inspection.

V. DESCRIPTION OF FACILITY:

OPC is permitted to treat and store hazardous waste in the units identified in its approved Operation Plan and Permit dated May, 29, 1990. For more details on the treatment processes see the July 28, 1992, Inspection Report (Attachment A, Page 6).

VI. DESCRIPTION OF HAZARDOUS WASTE ACTIVITY:

See July 28, 1992, Inspection Report (Attachment A, Pages 6 & 7).

VII. OBSERVATIONS:

We arrived at OPC at approximately 9:20 am and registered with security. We were greeted at the guard shack by William Mitzel, Chris Lilley and Willie Ndubuizu and escorted to a conference room. I stated the purpose of our visit and proceeded to request consent to conduct our inspection. I informed OPC that the CEI normally involves a facility walk-through, records review, photographs and sampling. I asked if that was O.K.; Mitzel granted the consent.

We began with a brief description of the duties performed by the individuals present and Mitzel gave a general description of the facility.

We then began a walk-through of the facility.

At the shipping and receiving area, we observed 4 roll-off bins identified as containing hazardous waste with no hazardous characteristic. The four roll off bins were identified as containing crushed drums (See Attachment B, Photos # 1,2,3,4).

We then proceeded to the filter press area and looked at the roll-off bin where the collection of filter cake occurs. The 20 cubic yard roll-off bin did not state the hazardous characteristic and was identified by OPC as containing hazardous waste (See Attachment B, Photo #5).

At the storage area, we observed that waste streams are segregated into several bays. The bays are segregated from letters "A" through "G" (See Attachment B, Photos # 6 & 7). Bay "A" is where flammable liquids and solids are stored and where repackaging occurs. Bays "B" and "C" store corrosive liquids and solids, bays "D" and "E" store oxidized liquids and solids and bays "F" and "G" store poison liquids and solids. During our walk-through we observed that several drums containing "F" and "D" series wastes had the marking of "other" when identifying a hazardous characteristic. We informed Ndubuizu that the containers must identify one of the criteria identified in Title 22. The drums contained one of the following wastes: F001, F002, F003, F005 or D018, D019 D021, D039 and D041. We identified forty three 55 gallon drums improperly identifying the hazardous characteristic (See Attachment B, Photos # 8, 9, 10 & 11). We also observed one 5 gallon container containing Phenol Chloroform improperly closed. The container was marked "poison" and was identified by Ndubuizu as containing hazardous waste (See Attachment B, Photo # 12).

Three 55 gallon drums of elemental mercury was also observed to have no hazardous characteristic in the storage area. We informed Ndubuizu again that these drums were also improperly labeled, he agreed and stated that it would be corrected

immediately (See Attachment B, Photo #'s 13, 14 & 15).

We than walked through their laboratory, where a satellite accumulation area for hazardous was identified by Ndubuizu. In this area Personal protective equipment is accumulated and later sent off-site for incineration.

Next, we did a walk-through of the waste-water treatment area. Ndubuizu informed us that the process has not change since our last inspection and that no new activities or discrepancies have occurred.

This completed our walk-through portion of our inspection.

We than proceeded to do a record review of OPC.

During the record review we noted that OPC's inspection logs for their process area and equipment did not note the time of inspection. We than observed that in the Contingency Plan, OPC failed to have the home addresses of two Emergency Coordinators. Instead OPC's contingency plan had the Emergency Coordinators P.O. Box address. We informed Ndubuizu and Mitzel the importance of having the emergency coordinator's address and they agreed to correct the discrepancy.

This completed the record review portion of our inspection.

VIII. DISCUSSION WITH MANAGEMENT:

At the conclusion of the activities of December 2, 1992, we discussed issues that were observed during the inspection.

We stated our concern regarding the labeling of all of the containers; we informed OPC that all containers should identify a hazardous characteristic.

We also stated that the inspection logs should note the time of the inspection.

We also stated that the contingency plan should include the home addresses of all the emergency coordinators.

We handed William Mitzel a copy of the Surveillance and Compliance Report, which discussed potential violations (See Attachment C).

No samples were taken during the December 2, 1992, inspection.

IX. VIOLATIONS:

COUNT 1: Title 22, CCR., Section 66262.34 (f) (3) (B).

Accumulation Time.

OPC failed to properly mark or label 50 containers, in that four roll-off bins containing hazardous waste in the shipping and receiving area and forty three 55 gallon drums of "F" and "D" series waste and three 55 gallon drums of elemental mercury at the storage area failed to include the following information:

- 1) Statement or statements which call attention to the particular properties of the waste.

Evidence: Statements from Ndubuizu identifying the wastes as hazardous. A letter from OPC to DTSC dated December 30, 1992, noting that the discrepancies had been corrected (See Attachment D). See Attachment B, photos # 1, 2, 3, 4, 5, 8, 9, 10, 11, 13, 14 & 15.

Witnesses: All violations were observed by witnesses 1, 2 & 3.

COUNT 2: Title 22, CCR., Section 66264.52 (d)

Content of Contingency Plan.

OPC failed to include all the required information in the contingency plan, in that the home addresses of two emergency coordinators were not listed in the contingency plan.

Evidence: DTSC inspectors during the record review noted that the contingency plan had P.O. box addresses instead of home addresses of two emergency coordinators. A letter from OPC to DTSC dated December 30, 1992, noting that the discrepancy had been corrected (See Attachment D).

Witnesses: All violations were observed by witnesses 1, 2 & 3.

COUNT 3: Title 22, CCR., Section 66264.173 (a).

Management of Container.

OPC failed to always keep a container holding hazardous waste closed at all times, in that one 5 gallon container of poison phenol chloroform was observed to be improperly closed.

Evidence: Ndubuizu identified the 5 gallon container of phenol chloroform as hazardous waste. See Attachment B, Photo # 12.

Witnesses: All violations were observed by witnesses 1, 2 & 3.

COUNT 4: Title 22, CCR., Section 264.15. (d)

General Inspection Requirements.

OPC failed to include all the required information in the inspection logs, in that the inspection log did not note the time the inspections were made.

Evidence: DTSC during the record review portion of the inspection noted the failure of OPC to include the time in which all the inspections were made on the inspection logs. A letter from OPC to DTSC dated December 30, 1992, noting that the discrepancy had been corrected (See Attachment D).

Witnesses: All violations were observed by witnesses 1, 2 & 3.

X. ATTACHMENTS:

- A: June 18, and July 24, 1992, Inspection Report - seven pages.
- B: December 2, 1992, Photographs - eight pages.
- C: Surveillance and Compliance Report - two page (front & back).
- D: OPC letter to the DTSC noting the correction of several violations noted during the December 2, 1992, inspection - one page.

XI. WITNESSES:

- 1. Guillermo A. Hernandez
Hazardous Materials Specialist
Department of Toxic Substances Control
Facilities Management Branch
1011 N. Grandview Avenue
Glendale, CA 91201

Will testify to the events and statements from the inspection conducted on December 2, 1992.

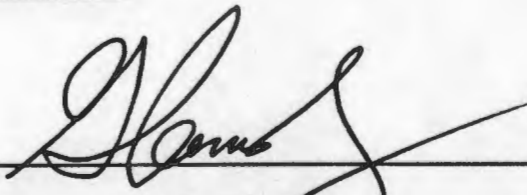
- 2. Roberto Kou
Associate Hazardous Materials Specialist
Department of Toxic Substances Control
Facilities Management Branch
1011 N. Grandview Avenue
Glendale, CA 91201

Will testify to the events and statements from the inspection conducted on December 2, 1992.

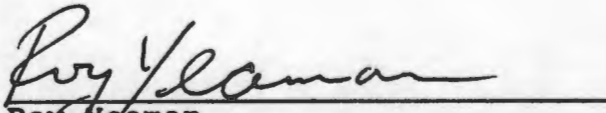
3. Shereef Aref
Hazardous Materials Specialist
Department of Toxic Substances Control
Facilities Management Branch
1011 N. Grandview Avenue
Glendale, CA 91201

Will testify to the events and statements from the inspection
conducted on December 2, 1992.

XII. SIGNATURES:


Guillermo Hernandez
Hazardous Materials Specialist

3-19-93
Date Submitted


Roy Yeaman
Senior Hazardous Materials Specialist

3-17-93
Date Approved

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504



ATTACHMENT A

June 18 and July 24, 1992, Inspection Report

I. PURPOSE:

To Conduct a Compliance Evaluation Inspection (CEI) of a RCRA treatment, storage, and transfer hazardous waste facility.

II. REPRESENTATIVES PRESENT:

Oil Process Company (OPC):

Ron Reed, President
Willy Ndubizu, Environmental Affairs Manager
Victoria Valliere, Health and Safety Manager
Chris Lilley, Drum Process Manager
Daryl McCullars, Shipping and Receiving
Desmond Phillips, Operations Manager

California Environmental Protection Agency/Department of Toxic Substances Control (Department):

Glenn H. Forman, Hazardous Materials Specialist
Jerry Lile, Associate Hazardous Materials Specialist
Andy Bajwa, Waste Management Engineer
Martina Gutierrez, Hazardous Materials Specialist (July 24, 1992 file review only)

III. OWNER/OPERATOR:

Oil Process Company is owned and operated by Oil Inc., dba OPC, a California corporation located at:

1848 E. 55th Street
Los Angeles, CA 90058

Oil Inc., dba Oil Process Company is a wholly owned subsidiary of Rollins Environmental Services, a Delaware corporation located at:

One Rollins Street
Wilmington, Delaware 19899

A name change to Rollins OPC, Inc. is pending. -

IV. BACKGROUND:

January 29, 1979 OPC obtains a hazardous waste hauler registration from the Department of

Health Services/Toxic Substances Control
Program (Department).

August 6, 1980	OPC submitted their Part A application identifying their hazardous waste activity as treatment, storage, disposal and transportation.
June 3, 1985	OPC was issued a Hazardous Waste Facility Permit by the Department for the storage, treatment, and transfer of identified hazardous waste in tanks and containers.
September 19, 1985	A transporter inspection was conducted at the facility by Department inspectors. Numerous manifest discrepancies were found.
October 14, 1985	OPC submitted to the Department a revised Notification of Hazardous Waste Activity form in which they identified their treatment process.
June 17, 1986	The Department issued OPC a Notice of Violation (NOV) for failing to maintain liability insurance for transportation operations.
August 29, 1986	The Department sent out notice revoking OPC's hauler registration. Simultaneously, OPC submits to the Department proof of liability insurance and the revocation was cancelled.
September 19, 1986	A complaint inspection was conducted at the facility by the Department. OPC was found in violation of the following transporter violations: storing hazardous waste over 96 hours, transporting hazardous waste with incomplete manifests, not listing their transporter EPA ID number, accepting manifests without generator signatures.
January 22, 1987	A follow-up to the September 19, 1986 inspection was conducted at the facility by the Department. OPC was found in compliance.
September 23, 1987	A RCRA inspection was conducted at the facility by the EPA. OPC was found in

violation of the following: poor management of containers, inadequate aisle space, inadequate operating record, and shipping hazardous waste without a manifest.

December 1988

OPC was bought by Rollins Environmental Services (Rollins).

May 16, 1989

As part of the permit renewal process, an inspection was conducted at the facility by the Department. Oil process was found to have installed and/or were operating the following hazardous waste management units that were not identified in their permit and approved operation plan: four Baker tanks, one sludge filter press, one steam stripper, and three carbon absorption tanks. The facility was also storing off-site hazardous waste in non-stationary containers outside of the approved and certified hazardous waste storage area.

May 31, 1989

The Department issued OPC a letter directing them to immediately discontinue the drum storage operation and the use of illegal units.

July 17, 1989

A complaint inspection was conducted at the facility by the Department as a result of the May 16, 1989 visit. Some of the violations noted were: storing and treating hazardous waste in eleven units never approved by the Department, failing to notify the Department at least 30 days in advance of the addition of twenty-one storage and/or treatment units, storing cyanides and acids in close proximity, storing reactive waste less than 50 feet from the property line, failure to store water reactive waste in an enclosed and contained storage area, open containers, inadequate labeling, and inadequate aisle space.

March 12, 1990

A RCRA inspection was conducted at the facility by the EPA. A Department inspector also attended. Some of the violations noted were: non-representative inventory log for the storage area,

unlabeled containers and tanks, inadequate personnel training, and incomplete waste analysis plan.

May 29, 1990

OPC was issued by the Department a Hazardous Waste Facility Permit renewal with modifications for the storage, treatment and transfer of off-site generated hazardous waste.

August 31, 1990

OPC's hauler registration expired. The hauler used now is Custom Environmental Transport (CET), which is a wholly owned subsidiary of Rollins.

March 6, 26 and
April 3, 1991

The Department conducts an inspection at the facility and the following violations were noted: storage of waste not identified in the operation plan, no secondary containment for container storage area, inadequate aisle space, improper labeling of containers, failed to inspect and document discrepancies on inspection log, stored ignitable waste within 50 feet of the property line, stored on-site waste over 90 days, failed to close drums when not in use.

May 8, 1991

OPC sends a revised Closure Plan and Closure Cost Estimate to the Department.

September 25, 1991

Science Applications International Corporation, a contractor representing the EPA, conducts an inspection at OPC and the following violations were noted: drum storage capacity was exceeded, stored waste acid in the storage bay designated for basic wastes.

January 6, 1992

The EPA conducted a RCRA inspection with DTSC personnel present. No violations were found.

May 20, 1992

The Department and OPC settle alleged violations identified in Reports of Violation dated August 7, 1990 and April 19, 1991. A Consent Agreement was issued in response to the violations discovered and OPC paid a penalty of \$325,000.

V. DESCRIPTION OF FACILITY:

The OPC facility is located at 5756 Alba Street in Los Angeles, California, adjacent to the Cities of Vernon and Huntington Park. The 2.1 acre facility (Attachment 1) began operations as a transporter in 1979. In June of 1985 OPC began to receive off-site generated waste for treatment and subsequent sewer discharge of treated effluent. They currently operate as a drum storage facility, wastewater treatment facility, container repackaging facility and transfer facility for ChemPak Inc., a lab-packaging division of Rollins.

OPC currently employs 40 people. The hours of operation are 6:00 a.m. to 10:30 p.m. and receiving hours are between 7:30 a.m. and 3:30 p.m. Four employees work on a recently started second shift.

At the time of our visit OPC had begun the permitted reconstruction of 40% of their plant, restricting site access to about 1.4 acres.

VI. DESCRIPTION OF HAZARDOUS WASTE ACTIVITY:

OPC is permitted to treat and store hazardous waste in the units identified in its approved Operation Plan and permit dated May 29, 1990.

The treatment processes performed OPC consist of: carbon absorption, blending compatible wastes, oxidation of cyanide waste, reduction of hexavalent chrome to trivalent chrome and neutralization and solidification of waste waters with heavy metals. The wastewater treatment process includes coagulation, flocculation, clarification, and filtration. The eventual disposal mechanism is to the sanitary sewer. Residues generated from the treatment activities (filter cake containing heavy metals and spent activated carbon) are collected in roll-off containers, manifested for off-site disposal and transported to Chemical Waste Management Kettleman Hills (Kettleman) landfill in California.

The wastewater treatment unit consists of: 9 above ground storage tanks (AST, V-1 thru V-6, are horizontal with smaller capacities than V-8 thru V-10 which are vertical), carbon absorption canisters to strip any organics, a caustic scrubber (lime column), a fume incinerator and a filter press (60 cubic foot capacity).

Treatment of aqueous waste occurs in 4,500 gallon to 8,000 gallon batches under authority of their current permit.

If the incoming wastestream is acidic or contains heavy metals, including hexavalent chrome, then the wastes are put into tank V-1 (10,000 gallon capacity). If the wastestream is basic or contains cyanide, tank V-2 (10,000 gallon capacity) is the receiving tank.

Sludge collected from the treatment activities in Tanks V-1 and V-2 are collected in Tank V-3 (10,000 gallon capacity). They are then pumped through a clarifier and then on to the filter press.

After treatment in Tanks V-1 and V-2 samples are taken and if treatment is determined to be complete, the effluent (as well as the filter press filtrate) is pumped into Tank V-4 (10,000 gallon capacity). After further gravity separation in V-4 the supernatant is transferred to Tank V-8, a 100,000 gallon holding tank. To remove any remaining organics the filtrate and supernatant from V-8 is pumped through a carbon absorption system. The effluent is then pumped into a check tank, Tank V-5 (8,200 gallon capacity). When this tank reaches its capacity it is sampled and, if it meets the established Los Angeles City Bureau of Sanitation criteria it is discharged into the sewer (OPC has a industrial wastewater permit, Attachment 2). the spent carbon is manifested to Rollins in Deer Park, Texas, for incineration.

Tank V-6 (10,000 gallon capacity) is used as a holding tank for low BTU wastes. Tank V-9 (100,000 gallon capacity) is used to store rain wastewater that is sent through the wastewater treatment process prior to sewer discharge. Tank V-10 (20,000 gallon capacity) is used to store waste with a high BTU value. Wastes from tanks V-6, V-8, V-9, and V-10 are sent through the vapor thermal oxidizer prior to sewer discharge. An activated carbon canister is available as a back-up.

Inorganic vapors from Tanks V-1, V-2, V-3, and V-4 are pumped through the caustic scrubber while volatile organic compounds from the vapor recovery system are burned in the fume incinerator.

The bulking and container repackaging operation begins with a physical and analytical compatibility testing. Then the incoming wastes are consolidated into homogeneuous wastestreams for off-site incineration. The waste is transported under manifest to one of the incineration facilities Rollins operates in Deer Park, Texas or Baton Rouge, Louisiana. Residue from this operation consists of empty drums which are crushed, on-site, collected in roll-off containers and manifested for off-site landfill disposal at Kettleman.

ATTACHMENT B

December 2, 1992, inspection photographs



Photo No.: 1 Date: December 2, 1992 Inspector: G. Hernandez

Description One roll-off bin at the shipping and receiving area, identified as hazardous waste and containing crushed drums was observed to be improperly labeled. Photo taken by Kou.



Photo No.: 2 Date: December 2, 1992 Inspector: G. Hernandez

Description One roll-off bin in the shipping and receiving area, identified as hazardous waste and containing crushed drums was observed to be improperly labeled. Photo taken by Kou.



Photo No.: 3 Date: December 2, 1992 Inspector: G.Hernandez

Description Photo of roll-off bin at the shipping and receiving area, identified as hazardous waste and containing crushed drums was observed to be improperly labeled. Photo taken by Kou.



Photo No.: 4 Date: February 15, 1991 Inspector: G.Hernandez

Description Photo of one roll-off bin at the shipping and receiving area identified as hazardous waste and containing crushed drums was observed to be improperly labeled. Photo taken by Kou.



Photo No.: 5 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one roll-off bin at the filter press area identified as hazardous waste and containing filter cake was observed to be improperly labeled. Photo taken by Kou.



Photo No.: 6 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of storage area, where waste streams are segregated into several bays. Photo taken by Kou.



Photo No.: 7 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of storage area, where waste streams are segregated into several bays. Photo taken by Kou.

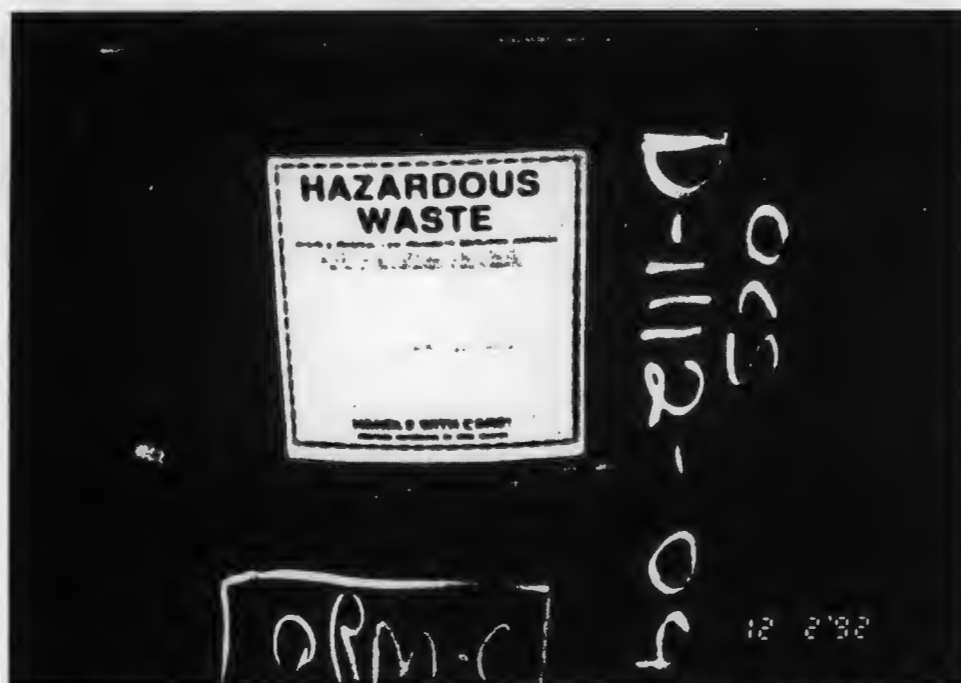


Photo No.: 8 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 55 gallon drum identified as containing "D" series hazardous wastes observed to have no hazardous characteristic. Photo taken by Kou at the storage area.

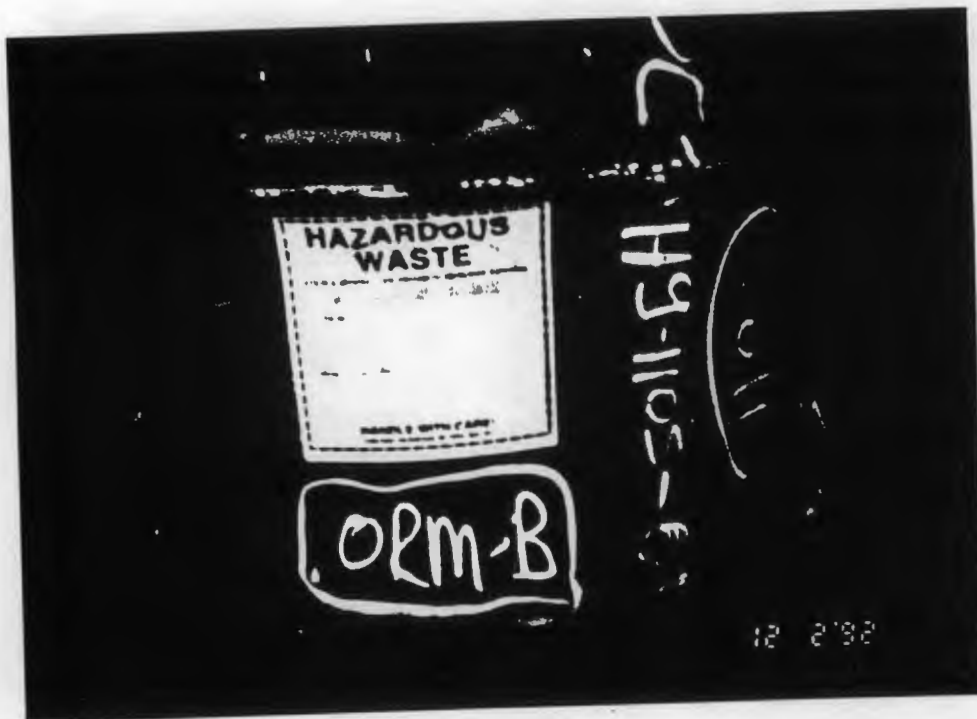


Photo No.: 9 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 55 gallon drum containing "D" series hazardous waste observed to have no hazardous characteristics. Photo taken by Kou at the storage area.

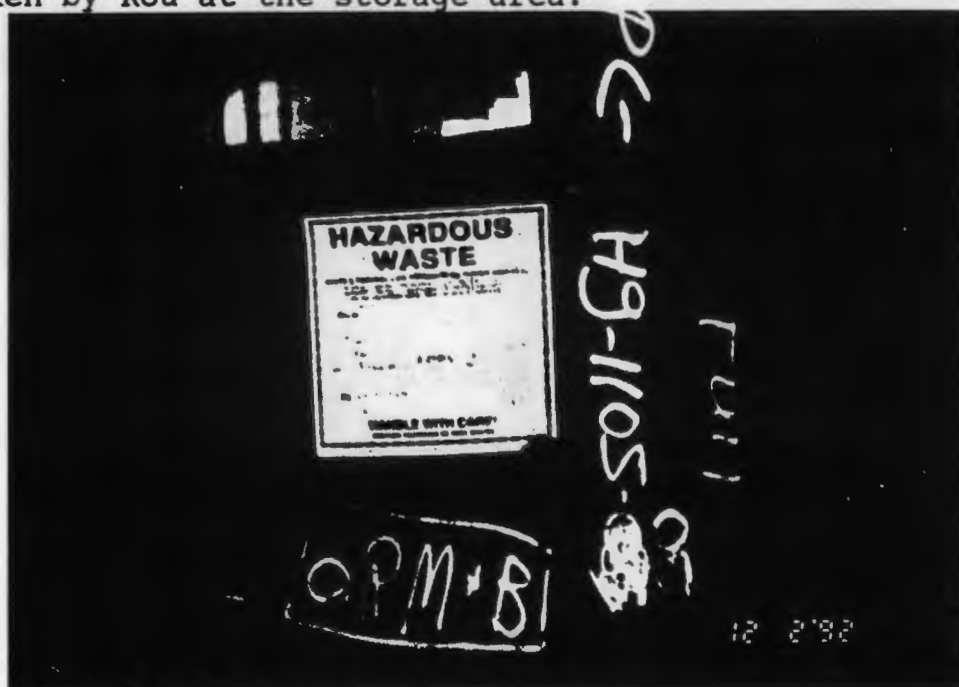


Photo No.: 10 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 55 gallon drum identified as containing "D" series hazardous waste observed to have no hazardous characteristics. Photo taken by Kou at the storage area.



Photo No.: 11 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 55 gallon drum containing "D" series hazardous waste observed to have no hazardous characteristic. Photo taken by Kou at the storage area.



Photo No.: 12 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 5 gallon container of phenol chloroform observed to be improperly closed. Photo taken by Kou at the storage area.



Photo No.: 13 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 55 gallon drum identified as hazardous waste containing elemental mercury observed with no hazardous characteristic. Photo taken by Kou at the storage area.



Photo No.: 14 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 55 gallon drum identified as hazardous waste containing elemental mercury observed with no hazardous characteristic. Photo taken by Kou at the storage area.



Photo No.: 15 Date: December 2, 1992 Inspector: G. Hernandez

Description Photo of one 55 gallon drum identified as hazardous waste containing elemental mercury observed with no hazardous characteristic.. Photo taken by Kou at the storage area.



ATTACHMENT C

Surveillance and Compliance Report

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
(REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

PASEO, CA 91504

(818) 567-3000

SURVEILLANCE AND COMPLIANCE REPORT
HAZARDOUS WASTE GENERATORS/
TRANSPORTERS/TSDFs

CAD 050 866 850 Date of Inspection 12 12 1992
Guillermo "Memo" Hernandez

EPA I.D. # _____ Inspector's Name: _____

Facility Name/Address: Rollins OPC Mailing Address: 5756 Albs St. Ownership: A subsidiary of
L.A. CA 90058 Rollins Environmental Services

County Los Angeles Type of business: A RCRA Persons present: Rollins
treatment, storage and William Mitzel, Chris Lilley
transfer hazardous Willy Ndubizu
waste facility DTSC: Memo Hernandez, Robert...

Contact Person William J. Mitzel

Phone # (213) 585-5063

Samples taken? ☐ Yes (receipt attached) ☒ No

Plan of Correction necessary? ☐ Yes (Due date: _____) ☐ No

Discussions with Management: Consent to conduct the CBI at the facility for
a record review, walkthrough, photographs and sampling was given by Mr. Mitzel

Potential violations:
A) Walk-through
1) 4 - Roll off Bins with no hazardous characteristic
2) 1 - 55 gallon container of poison - open (Ammonium Chloride)
3) 2 - 55 gallon drum of Acetone - no Haz. characteristic

Facility operating under: ☐ ISD ☒ Permit ☐ Other _____ → other side

On this date an inspection of your facility was conducted under authority of Section 25185, California Health and Safety Code (H&SC) and Section 66272.1, Title 22, California Code of Regulations. The collection of samples or other evidence, including the taking of photographs, was done under authority of Section 66272.1, Title 22, California Code of Regulations. Specific violations of one or more Sections of the H&SC; Title 22, California Code of Regulations; or Code of Federal Regulations, Part 40 are noted above. These violations relate to the generation, storage, handling, transportation, and/or disposal of hazardous and extremely hazardous waste.

Authorized Representative of Firm*

Name William J. MitzelTitle PresidentSignature [Signature]Date 12/2/92

Authorized State Agent

Name Guillermo A. HernandezTitle Hazardous Materials SpecialistSignature [Signature]Date 12/2/92

* Signature of firm representative signifies receipt of copy of this form

ATTACHMENT D

December 30, 1992, OPC letter to DTSC

JAN 05 1993

December 30, 1992

Guillermo A. Hernandez
Hazardous Material Specialist
California Environmental Protection Agency
Department of Toxic Substance Control
1405 No. San Fernando Blvd.
Burbank, CA 91504

Dear Mr. Hernandez

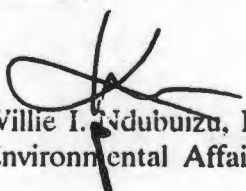
This is to inform you of the actions we have taken to address the issues raised, during your last inspection of our facility in December 2, 1992.

1. We have installed a mechanism to assure that our hazardous waste labels are printed correctly, and all the hazard properties are indicated. When the waste is a combination of several wastes with different properties, a combination of these properties will be indicated.
2. All inspections logs that did not specify time of the inspection have been revised to indicate the time of the inspection. Also added is when corrective action is completed if corrective action is required as a result of inspection.
3. Our contingency plan has been revised to indicated street address for all emergency coordinator.

I hope this answers the questions raised during the inspection, if you need further clarification, please call me at (213) 585-5063.

Thank you for your cooperation.

Sincerely,


Willie I. Ndubuisi, P.E.
Environmental Affairs Manager

cc: Bill Mitzel
Phil Retallick
John C. Day
Desmond Phillip
Chris Lilley
Darryl McCullers
Shirely Kirby
Vikie Parker